

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

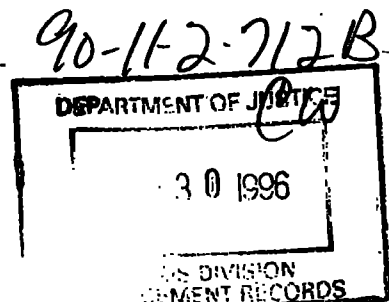
A.C.E. BUILDING SERVICE, INC.,
ACTION CYCLE,
AMOCO CORPORATION,
A.M. RICHTER SONS CO.,
ARCHER DANIEL MIDLANDS COMPANY
(for KURTH MALTING and
WISCONSIN MALTING)
BRANCH RIVER COUNTRY CLUB,
BRAUN BUILDING CENTER, INC.
(for BRAUN LUMBER),
BRIDGESTONE/FIRESTONE, INC.,
CITY OF BRILLION,
BRILLION IRON WORKS, INC.,
BRUNSWICK CORP.,
BUSCH AGRICULTURAL RESOURCES, INC.
(ANHEUSER-BUSCH COMPANIES, INC.),
CAWLEY CO., a division of
CONTEMPORARY, INC.,
CONSUMERS, INC.,
CRAFTS ELECTRIC, INC.,
CULLIGAN WATER CONDITIONING,
GARY AND NANCY FECHNER (d/b/a
DAIRY QUEEN, MANITOWOC),
FIRST NATIONAL BANK OF MANITOWOC,
FLEET AND FARM OF MANITOWOC, INC.,
GATERMAN MANUFACTURING COMPANY,
GOULD INC. (for IMPERIAL EASTMAN),
HAMMAN CONSTRUCTION COMPANY,
HERESITE PROTECTIVE COATINGS, INC.
(for HERESITE-SAEKAPHEN),
HOFFMAN BROS., INC.,
INTERSTATE WELDING SALES CORP.,
(for MANITOWOC OXYGEN),
J.J. STANGEL COMPANY,
JAGEMANN STAMPING COMPANY,
KAUFMAN MFG, CO.,
VILLAGE OF KELLNERSVILLE,
LAKELAND LANDSCAPE SERVICE, INC.,
LAKESIDE MACHINE SHOP, INC.,
LATE'S BAR-B-Q STAND,
RAY LUISIER PLUMBING SERVICE, INC.,
THE COUNTY OF MANITOWOC,
MANITOWOC GREY IRON FOUNDRY,
MANITOWOC LANDSCAPE, INC.,
MANITOWOC PUBLIC SCHOOL DISTRICT,

FILED
U.S. DISTRICT COURT EAST DIST. WISCONSIN
21 1996
O'CLOCK
SOFRON A. NEDILSKY

96-C-0739

C.A. No. 96-C-_____

Honorable Rudolph T. Randa



Copy mailed to attorneys for
parties by the Court pursuant
to Rule 77 (d) Federal Rules of
Civil Procedure.

MANITOWOC SELF-SERVICE CAR WASH
 (a/k/a THOR CAR WASH),
 MCMULLIN & PITZ CONSTRUCTION CO.,
 MEADOW LANES, INC.
 (for MEADOW LINKS),
 MEDUSA CORPORATION
 (for MEDUSA CEMENT CO.),
 MIKE CHECK BUILDERS, INC.,
 NORTHWESTERN ELEVATOR CO., INC.
 OIL-RITE CORPORATION,
 RAHR BIO-TECHNICAL LABORATORIES,
 REEDSVILLE COOPERATIVE ASS'N.,
 REX-CLEAN, INC.,
 SANTA'S BEST
 (for NATIONAL TINSEL MFG. CO.),
 SCHAUS ROOFING & MECHANICAL
 CONTRACTORS, INC.
 (for WILLIAM SCHAUS & SONS CO.),
 SCHWERMANN TRUCKING CO.,
 SHELL OIL COMPANY,
 SHOTO CORPORATION
 (for SHOTO FIXTURE & SUPPLY),
 SILVER CREEK NURSERIES INC.,
 SUPERIOR WATERCARE, INC.,
 SWANSON ENVIRONMENTAL, INC.,
 TERP'S CALUMET AUTO SALES,
 >VILLAGE OF VALDERS,
 WALSDORF ROOFING COMPANY, INC.,
 WHITELAW SAUSAGE CO.,
 WISCONSIN BELL TELEPHONE CO., and
 WISCONSIN FUEL & LIGHT CO.,

Defendants.

LEMBERGER SITES REMEDIATION GROUP

Plaintiff,

v.

AMOCO CORPORATION, et al.

Defendants.

LEMBERGER SITES REMEDIATION GROUP

Plaintiff,

v.

A.M. RICHTER & SONS, CO.,

Defendants.

C.A. No. 95-C-1064

Honorable Rudolph T. Randa

C.A. No. 95-C-1065

Honorable Rudolph T. Randa

GLOBAL CONSENT DECREE FOR DE MINIMIS PARTIES

1. The United States of America on behalf of the Administrator of the United States Environmental Protection Agency ("U.S. EPA"), simultaneously with lodging this Consent Decree is filing a complaint against the Defendants in the above captioned action pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §§ 9601, et seq., ("CERCLA"). The Lemberger Sites Remediation Group ("LSRG") has also filed separate complaints pursuant to CERCLA and applicable state law. These actions seek the recovery of costs previously incurred and paid, and to be incurred and paid in the future, in response to the release or threatened release of hazardous substances at or in connection with the Lemberger Flyash Superfund Site (Site 5-3E, the "Flyash Site"), and the Lemberger Transport & Recycling Superfund Site (Site 5J4, the "LTR Site"), both located in Manitowoc County, Wisconsin (collectively "the Sites").

2. The Sites are two waste disposal areas, located one quarter mile apart, in a primarily agricultural area.

3. Following placement of the Sites on the National Priorities List, U.S. EPA conducted one remedial investigation and feasibility study for both Sites. As a result of the investigation, U.S. EPA concluded that various organic and inorganic material had contaminated soil, groundwater, and surface water, and thereby posed a threat to human health and the environment. Some of the hazardous substances found at the Sites

include, but are not limited to, 2-4 dimethylphenol, arsenic, barium, carbon tetrachloride, chlorobenzene, methylene chloride, nitrobenzene, toluene, polynuclear aromatic hydrocarbons, and vinyl chloride. As a result of groundwater contamination from the Sites several residential wells in the area surrounding the Sites had to be redrilled to a deeper aquifer.

4. U.S. EPA has divided the clean up at the Sites into two separate "operable units." On October 20, 1992, this Court entered a Consent Decree between the United States, the State of Wisconsin and eleven potentially responsible parties (the "Settling Responsible Parties") in which they agreed to perform the "Operable Unit 1" remedy: construction of a slurry wall around and placement of a cap on the Flyash Site, and the installation of a groundwater pump and treat system to capture and treat the combined plume of contamination from both of the Sites. That remedial action is ongoing.

5. On July 15, 1993, the Regional Administrator of U.S. EPA Region V ("the Regional Administrator") and the Settling Responsible Parties entered into an Administrative Order by Consent pursuant to Sections 106 and 122 of CERCLA, 42 U.S.C. §§ 9606 & 9622, in which they agreed to perform a removal action for "Operable Unit 2." The removal action involves excavation of buried drums, treatment and disposal of contaminated wastes and soils, and capping the LTR Site. The removal action is also ongoing.

6. U.S. EPA and the United States Department of Justice ("U.S. DOJ") have incurred approximately \$3,000,000 in unreimbursed response costs in connection with the release or threatened release of hazardous substances at the two Lemberger Sites, which costs continue to accrue.

7. The LSRG has incurred and paid approximately \$6,000,000 in unreimbursed response costs in connection with the release or threatened release of hazardous substances from the two Lemberger Sites, and expects to incur and pay approximately an additional \$24,000,000 in response costs in connection with the Sites in the future.

8. The Regional Administrator has determined that the de minimis settlement provided for in this Consent Decree pursuant to Section 122(g)(1), 42 U.S.C. § 9622(g)(1) is practicable and is in the public interest.

9. The Regional Administrator has determined that the settlement embodied in this Consent Decree involves only a minor portion of the response costs at the Sites.

10. The Regional Administrator has determined that based upon information currently known to the United States the amount of hazardous substances contributed to the Sites by each "de minimis" party whose name appears on Appendix 1 to this Agreement is minimal, and that the hazardous substances contributed to the Sites by each such "de minimis" party are not significantly more toxic or of significantly greater hazardous effect than other hazardous substances at the Sites pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A).

11. Each "de minimis" party's payment as required in Section IV. of this Consent Decree, and as set forth in Appendix 2, reflects the appropriate share of that party's liability under CERCLA for all past and future response costs incurred and paid or to be incurred and paid by U.S. EPA and U.S. DOJ at or in connection with the two Sites.

12. Each "de minimis" party's payment as required in Section IV., and as set forth in Appendix 3, reflects the appropriate share of that party's liability under CERCLA and applicable state law for all past and future response costs incurred and paid, or to be incurred and paid by the LSRG at or in connection with the two Sites.

I. DEFINITIONS

13. Unless otherwise expressly provided herein, terms used in this Consent Decree that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in CERCLA or in such regulations. Whenever terms listed below are used in this Consent Decree, or in any appendix attached hereto, the following definitions shall apply:

(a) "CERCLA" shall mean the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601, et seq.

(b) "Consent Decree" shall mean this Decree, and any attached appendices;

(c) "Day" shall mean a calendar day. In computing any period of time under this Consent Decree, where the last day falls on a Saturday, Sunday, or federal holiday, the period shall run until the close of business of the next working day;

(d) "Interest," in accordance with 42 U.S.C. § 9607(a) shall mean interest at the rate specified for interest on investments of the Hazardous Substance Superfund established under Subchapter A of Chapter 98 of Title 26 of the United States Code. For the period October 1, 1994 through September 30, 1995 the rate is 5.63%.

(e) "Lemberger Sites" or "the Sites" shall mean both the Lemberger Flyash Superfund Site, and the Lemberger Transport & Recycling Superfund Site located in Manitowoc County, Wisconsin, which are separately listed on the National Priorities List, 40 C.F.R. Part 300. The Sites are a facility as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9);

(f) "LSRG" shall mean the Settling PRPs who signed the Consent Decree in Civil 92-C-0593 (E.D. Wis.) entered on October 20, 1992, and Red Arrow Products Inc, a Wisconsin Corporation, Invincible Metal Furniture Co., and the Great Atlantic & Pacific Tea Co., Inc.¹

¹ Nothing in this Consent Decree affects the liability of Red Arrow Products Company, a Wisconsin Corporation, Red Arrow Partnership, Invincible Metal Furniture Co., Inc. to the United States. Further, the Great Atlantic & Pacific Tea Company remains liable to the United States unless and until it settles with the United States pursuant to a Consent Decree.

(g) "Matters addressed," as that term is used in Section X. of this Decree and/or Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), shall mean all response costs incurred and paid or to be incurred and paid directly or indirectly by U.S. EPA, by U.S. DOJ on behalf of U.S. EPA, by the LSRG, or by any party in connection with the Lemberger Sites, including but not limited to all removal and remedial costs;

(h) "Paragraph" shall mean a portion of this Consent Decree identified by an arabic numeral or an upper case letter;

(i) "Parties" shall mean the United States, the LSRG, and the Settling De Minimis Parties whose names appear on Appendix 1;

(j) "Potentially Responsible Party" means any person who is liable or potentially liable to the United States and/or to the LSRG for response costs incurred and paid, and to be incurred and paid, at or in connection with the Lemberger Sites pursuant to Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

(k) "Response Costs" means any costs incurred, plus interest, pursuant to CERCLA, 42 U.S.C. §§ 9601, et seq. at or in connection with the Sites;

(l) "Section" shall mean a portion of this Consent Decree identified by a roman numeral;

(m) "Settling De Minimis Parties" shall mean those Lemberger PRPs who qualify for "de minimis" treatment under CERCLA Section 122(g)(1)(A), 42 U.S.C. § 9622(g)(1)(A), and who

have executed this Consent Decree, as listed in Appendix 1 to this Consent Decree;

(n) "United States" shall mean the United States of America, its departments, agencies and instrumentalities, including but not limited to the U.S. EPA and U.S. DOJ acting on behalf of U.S. EPA;

Accordingly, it is hereby ORDERED, ADJUDGED, and DECREED as follows:

II. JURISDICTION

13. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1345, and 42 U.S.C. §§ 9613(b) and 9622(g)(4), and other applicable state and federal laws. This Court also has personal jurisdiction over the Settling De Minimis Parties. Solely for purposes of this Consent Decree and the two underlying complaints filed by the United States and the LSRG, the Settling De Minimis Parties waive all objections and defenses that they may have to the jurisdiction of the Court or to venue in this District, and they agree not to challenge the terms of this Consent Decree or this Court's jurisdiction to enter and enforce this Consent Decree.

III. PARTIES BOUND

14. This Consent Decree is binding upon the United States, the LSRG and the Settling De Minimis Parties, and their successors and assigns. Any change in ownership or corporate or legal status of a Settling De Minimis Party including, but not

limited to, any transfer of assets, or real or personal property shall in no way alter that party's responsibilities under this Consent Decree. Each signatory to this Consent Decree represents that he or she is fully authorized to agree to the terms and conditions of the Consent Decree and to bind legally the Party represented by him or her.

IV. REIMBURSEMENT OF RESPONSE COSTS

15. Within 45 days of entry of this Decree, each Settling De Minimis Party shall pay to the United States the agreed upon amount as set forth in Appendix 2 to this Decree, and shall pay to the LSRG the agreed upon amount as set forth in the Affidavit and chart attached to Appendix 3. The proceeds received by the United States under this Decree shall be used to reduce the United States' outstanding claims for past response costs relating to the Sites. The proceeds received by the LSRG shall be used to reduce its outstanding claims for past and future response costs relating to the Sites.

16. If a Settling De Minimis Party fails to make the payments required of it in Appendix 2 and/or Appendix 3, that Party shall pay Interest (as defined in Paragraph 12(d)) to the United States and/or the LSRG on the unpaid balance. Interest on the unpaid balance shall accrue from the day after payment is due until the date of payment, and shall be paid simultaneously with payment of the required amount. Payment of interest made under this paragraph shall be in addition to such other remedies or sanctions available

to the United States or to the LSRG by virtue of a Party's failure to make timely payment under this Section.

17. Payment of the amount set forth in Appendix 2, (and any interest or penalty, if applicable), shall be made by cashier's check written out to the Department of Justice, and sent to the following address:

Collections Office
U.S. Attorney for the Eastern District of Wisconsin
517 East Wisconsin Avenue
Room 530
Milwaukee, WI 53202
Re: Lemberger Sites De Minimis Settlement
CERCLA Site Nos. 5-3E and 5-J4.

18. Payment to the LSRG of the full amount set forth in Appendix 3, and any interest, if applicable, shall be paid by cashier check to the LSRG at the following address:

Douglas B. Clark
Counsel for the Lemberger Sites Remediation Group
Foley & Lardner
P.O. Box 1497
150 East Gilman Street
Madison, WI 53701-1497

Further, a copy of the cashier's check and any accompanying letter sent to Douglas Clark shall also be sent to the United States at the address provided in the next paragraph.

19. At the time of payment of the amount set forth in Appendix 2, each Settling De Minimis Party shall simultaneously send written notice of payment and a copy of any transmittal documentation to the United States at the following address:

Lisa A. Cherup
Trial Attorney

Environmental Enforcement Section
Environment & Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
DJ # 90-11-2-712A

20. In addition to any other remedies or sanctions available to the United States, any Party who fails or refuses to comply with any term or condition of this Consent Decree shall be subject to a civil penalty of up to \$25,000 per day of such failure or refusal pursuant to Section 122(1) of CERCLA, 42 U.S.C. § 9622(1).

V. CERTIFICATION OF SETTLING DE MINIMIS PARTIES

21. Through the act of signing this Consent Decree, each Settling De Minimis Party certifies, individually, that it has conducted a thorough, comprehensive, good faith search for information, documents, and any evidence of destruction of or tampering with information or documents, and has fully and accurately disclosed to U.S. EPA (or U.S. DOJ) all information currently in its possession, or available to it or in the possession of or available to its officers, employees, contractors or agents, which relates in any way to the ownership, operation, generation, treatment, transportation, storage or disposal of a hazardous substance, pollutant or contaminant at or in connection with the Site. Through the act of signing this Consent Decree, each Settling De Minimis Party further certifies, individually, that it has disclosed to U.S. EPA (or U.S. DOJ) all evidence, if any, of destruction or tampering with any documents or other information relating to its potential liability regarding the

Sites, and that it has fully and accurately complied with any and all U.S. EPA requests for information pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e), and Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927.

**VI. COVENANTS NOT TO SUE BY THE UNITED STATES
AND BY THE LEMBERGER SITES REMEDIATION GROUP**

22. Subject to the terms of the "Certification" of each Settling De Minimis Party set forth in Section V. and the "Reservation of Rights" set forth in Section VIII. of this Consent Decree, upon payment by a Settling De Minimis Party of the amount specified in Appendix 2 to this Consent Decree, plus any interest due and owing, if any, pursuant to paragraph 16 above, and any penalty due and owing, if any, pursuant to paragraph 20 above, the United States covenants not to sue and agrees not to take any other administrative or civil action against the Settling De Minimis Party for reimbursement of response costs incurred or to be incurred at or in connection with the Lemberger Sites, or for injunctive relief pursuant to Sections 106(a) or 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) or 9607(a), relating to the Lemberger Sites. With respect to present and future liability, this covenant not to sue shall take effect for a particular Settling De Minimis Party only upon receipt by the United States of the payment required of that particular Settling De Minimis Party, as set forth in Appendix 2 to this Decree, plus interest due and owing, if any, pursuant to paragraph 16 above. This covenant not to sue extends only to the

Settling De Minimis Parties, and does not extend to any other person or entity.

23. Subject to the terms of the "Certification" of each Settling De Minimis Party set forth in Section V. and the "Reservation of Rights" set forth in Section VIII. of this Consent Decree, upon payment by a Settling De Minimis Party of the amount specified in Appendix 3 to this Consent Decree, plus any interest due and owing, if any, pursuant to paragraph 16 above, the LSRG covenants not to sue and agrees not to take any other action against the Settling De Minimis Party for reimbursement of response costs incurred or to be incurred at or in connection with the Sites, or for injunctive relief pursuant to CERCLA or applicable State law. With respect to present and future liability, this covenant not to sue shall take effect for a particular Settling De Minimis Party only upon receipt by the LSRG of the payment required from that particular Settling De Minimis Party, as set forth in Appendix 3 to this Decree, plus interest due and owing, if any, pursuant to paragraph 16 above. The LSRG's covenant not to sue extends only to the Settling De Minimis Parties, and does not extend to any other person or entity.

VII. INDEMNIFICATION BY THE LSRG

24. Subject to the terms of the "Certification" of each Settling De Minimis Party set forth in Section V. and the "Reservation of Rights" set forth in Section VIII. of this Consent Decree, following execution of this Consent Decree by a Settling De

Minimis Party and payment of the amount specified for that Settling PRP in Appendices 2 and 3, plus any interest due and owing, if any under the Decree, the LSRG shall indemnify, save harmless and defend that Settling De Minimis Party from and against any and all losses, costs, liabilities, claims, obligations, fines, penalties, actions, suits, proceedings, judgments, damages and/or expenses incurred by, imposed upon, or commenced or asserted against that Settling De Minimis Party which are suffered by that Settling De Minimis Party in connection with any claims related to the activity required by the terms and conditions of the Consent Decree entered in C.A. No. 92-C-0583, dated October 20, 1992 (E.D. Wisconsin), and U.S. EPA Administrative Order by Consent Decree V-W-93-C-196, dated July 15, 1993. In addition to the Reservation of Rights (Section VIII.), this Indemnification does not apply to any action against a Settling De Minimis Party for recovery of costs incurred by U.S. EPA, U.S. DOJ, or the Wisconsin Department of Natural Resources in connection with the Sites.

25. If any action, demand or claim which is subject to the indemnity provided in paragraph 24 of this Consent Decree, shall be brought or asserted against a Settling De Minimis Party, the Settling De Minimis Party shall, within a reasonable time, notify the LSRG in writing, and only upon receipt of such notice shall the LSRG be obligated to assume the defense thereof. The Settling De Minimis Party shall cooperate, to the extent reasonably possible, with the LSRG in the defense of the action, demand or claim. The LSRG shall not be liable for any settlement by the Settling De

Minimis Party of any action, demand or claim against the Settling De Minimis Party effected without the LSRG's written consent.

VIII. RESERVATION OF RIGHTS

26. The covenants not to sue by the United States and the LSRG set forth in Section VI., and the indemnification provided by the LSRG in Section VII., do not pertain to any matters beyond the civil claims specifically stated in Section VI.

27. As to all other matters, nothing in this Consent Decree is intended or shall be construed as a release, covenant not to sue, or indemnity for any claims or causes of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the United States, including U.S. EPA, and/or the LSRG may have against each Settling De Minimis Party with respect to all other matters, including but not limited to the following:

- (a) claims based on a failure to make the payments required in Section IV. and Appendices 2 or 3 of this Consent Decree;
- (b) criminal liability;
- (c) liability for damages for injury to, destruction of, or loss of natural resources, and for the costs of any natural resource damage assessments;
- (d) any liability as a result of a Settling De Minimis Party's disposal activities at any other disposal site, including but not limited to the "Ridgeview Landfill," in

Manitowoc County, Wisconsin, currently owned by Waste Management, Inc.;

(e) any liability for response costs that have been or may be incurred by federal natural resource trustees in connection with the Lemberger Sites.

28. This Consent Decree is entered into without any admission of liability and, further, this Consent Decree shall not be admissible in evidence in any administrative or judicial proceeding except by the Parties in a proceeding to enforce this Consent Decree.

IX. COVENANTS NOT TO SUE BY SETTLING DE MINIMIS PARTIES

29. Each Settling De Minimis Party covenants not to sue and agrees not to assert any claims or causes of action against the United States or its contractors, representatives or employees with respect to the Lemberger Sites or this Consent Decree, including but not limited to, any direct or indirect claim for reimbursement from the Hazardous Substance Superfund (established pursuant to the Internal Revenue Code 26 U.S.C. § 9507) through Sections 106(b)(2), 111, 112 or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9611, 9612 or 9613, or any other provision of law, any claim or cause of action against the United States, its contractors, representatives or employees under CERCLA Sections 107 and 113, 42 U.S.C. §§ 9607 and 9613, or any claims arising out of response activities at or in connection with the Site. Nothing in this Consent Decree shall be

deemed to constitute preauthorization of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

30. Notwithstanding any other provision in this Consent Decree, the United States, including U.S. EPA, reserves, and this Consent Decree is without prejudice to, the right to institute judicial proceedings or to issue an administrative order seeking to compel the Settling De Minimis Parties to perform response actions relating to the Site, and/or to reimburse the United States, including U.S. EPA, for additional costs of response, if information not currently known to the U.S. EPA is discovered which indicates that any Settling De Minimis Party contributed hazardous substances to the Site in such greater amount or of such greater toxic or other hazardous effects that the Settling De Minimis Party no longer qualifies as a de minimis party at the Site under the criteria set forth in Paragraph 10 above.

31. Each Settling De Minimis Party covenants not to sue and agrees not to assert any claims or causes of action against the LSRG, its contractors, representatives or employees with respect to the Sites or this Consent Decree, including but not limited to any claim against the LSRG under CERCLA or any provision of federal or state law.

32. Notwithstanding any other provision in this Consent Decree, the LSRG reserves, and this Consent Decree is without prejudice to, the right to institute judicial proceedings seeking to compel the Settling De Minimis Parties to perform response

actions relating to the Sites, and/or to reimburse the LSRG for additional cost of response, if information not currently known to the LSRG and/or the Settling De Minimis Party is discovered which indicated that any Settling De Minimis Party contributed hazardous substances to the Site in such greater amount or of such greater toxic or other hazard effects that the Settling De Minimis Party no longer qualifies as a de minimis party at the Site under the criteria set forth in Paragraph 10 above.

X. EFFECT OF SETTLEMENT; CONTRIBUTION PROTECTION

31. Nothing in this Consent Decree shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Decree.

32. With regard to claims for contribution against Settling De Minimis Parties for "matters addressed" in this settlement, the Parties hereto agree that, upon receipt by the United States of the payment required in Section IV. of this Decree, and upon receipt by the United States of documentation that a Settling De Minimis Party has paid the LSRG the amount the LSRG has demanded of that Party, a Settling De Minimis Party is entitled to protection from contribution actions or claims for "matters addressed" by this Consent Decree, as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2), 9622(g)(5).

XI. PUBLIC COMMENT

33. This Consent Decree shall be subject to a thirty day public comment period. The United States may withdraw its consent to this Consent Decree if comments received disclose facts or considerations which indicate that this Consent Decree is inappropriate, improper or inadequate.

34. The Settling De Minimis Parties and the LSRG consents to approval and entry of this Consent Decree without further notice.

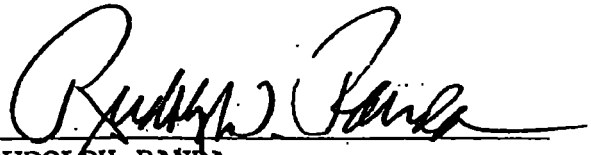
XII. BINDING EFFECT IN THE EVENT THE CONSENT DECREE IS NOT ENTERED

35. In the event that this Consent Decree is not entered by the Court for any reason, the terms of this Consent Decree as between the United States and the Settling De Minimis Parties will be null and void. However, as between the LSRG and the Settling De Minimis Parties, the terms, conditions and obligations of this document shall become a binding contract between them, and the LSRG shall promptly dismiss its civil action against the Settling De Minimis Parties.

XIII. EFFECTIVE DATE

36. The effective date of this Consent Decree shall be the date of entry by this Court.

ENTER:

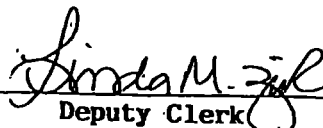

RUDOLPH RANDA,
United States District Judge

DATED: *May 8, 1997*

Judgment entered this 8th day of May, 1997.
SOFRON B. NEDILSKY, Clerk of Court

20


by:


Deputy Clerk

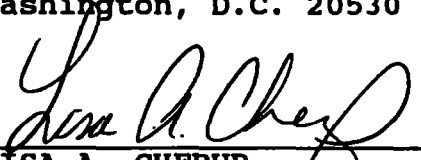
The undersigned parties enter into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Superfund Sites.

FOR THE UNITED STATES OF AMERICA

Date:




LOIS J. SCHIFFER
Assistant Attorney General
Environmental Enforcement Section
Environment & Natural Resources
Division
U.S. Department of Justice
Washington, D.C. 20530



LISA A. CHERUP
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources
Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611

THOMAS P. SCHNEIDER
United States Attorney for the
Eastern District of Wisconsin

By:



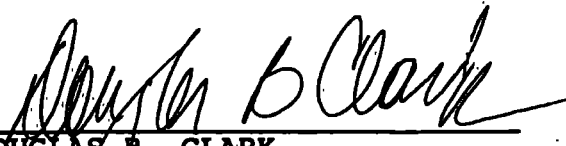
WILLIAM J. LIPSCOMB
Assistant United States Attorney
for the Eastern District of
Wisconsin
330 Federal Building
517 East Wisconsin Avenue
Milwaukee, WI 53202

Wicks for
VALDAS V. ADAMKUS
Regional Administrator, Region V
U.S. Environmental Protection
Agency
77 West Jackson
Chicago, Illinois 60604

Wicks for
NOLA HICKS
Assistant Regional Counsel
U.S. Environmental Protection
Agency
77 West Jackson
Chicago, Illinois 60604

FOR THE LEMBERGER SITES REMEDIATION
GROUP

Date: June 6, 1996


DOUGLAS B. CLARK
Foley & Lardner
Post Office Box 1497
150 East Gilman Street
Madison, Wisconsin 53701-1497


GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR A.C.E. Building Service, Inc.

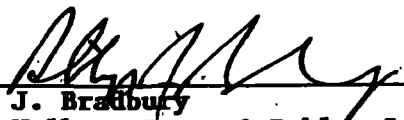
[Name of De Minimis Settling Party]

Date: 12-15-95

 Pres.
Ronald H. Schwalbe, President
2513 Marshall Street, P. O. Box 1626—
Manitowoc, WI. 54221-1626
(414) 682-6105

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:


Philip J. Bradbury
Melli, Walker, Pease & Ruhly, S.C.
P. O. Box 1664
Madison, WI 53701-1664
(608) 257-4812
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

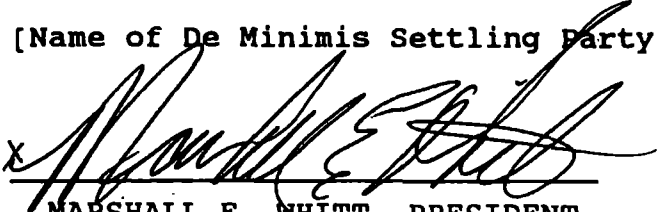
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR ACTION CYCLE

[Name of De Minimis Settling Party]

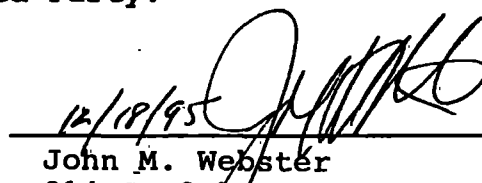
Date: 12/18/95

X 

MARSHALL E. WHITT, PRESIDENT
2881 Ct. CR
Manitowoc, WI 54220
Phone: 414-682-3803

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

12/18/95 
John M. Webster
814 S. 8th Street
P. O. Box 487
Manitowoc, WI 54221-0487 Phone: 414-682-8181
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR AMOCO CORPORATION

[Name of De Minimis Settling Party]

Date: January 19, 1996

BY: Walter R. Quanstrom DMT

WALTER R. QUANSTROM
Vice President, EH&S
Amoco Corporation
200 East Randolph Drive
Chicago, Illinois 60601

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Dale M. Iwataki 1/22/96

DALE M. IWATAKI
Amoco Corporation
200 East Randolph Drive
Chicago, Illinois 60601
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc. et al., relating to the Lemberger Landfill Superfund sites.

FOR A.M. Richter Sons Co

[Name of De Minimis Settling Party]

Date: Feb 9, 1996

William A. Richter - Pres

P.O. BOX 1053
MANITOWOC WI 54221-1053
702 414-684-6207

[Name, Address and Phone Number of Officer Authorized to Sign on Behalf of De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

Richard S. Baron
Kitch, Drutchas, Wagner & Kenney
Kent P. Kitch
One Woodward Avenue
Detroit MI 48226 (313) 965-7587
[Name, Address and Phone Number of Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

*Archer - Daniels - Midland Company
and its subsidiaries and divisions*

FOR _____

[Name of De Minimis Settling Party]

Date: 2/22/96

SA Robert

*Corporate Counsel
4666 Faries Parkway
Decatur, IL 62526
217/424-7244*

[Name, Address and Phone Number of Officer Authorized to Sign on Behalf of De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

*CT Corporation
208 S. LaSalle St
Chicago, IL 60604
312/345-4332*

[Name, Address and Phone Number of Authorized Agent for Service of Process]

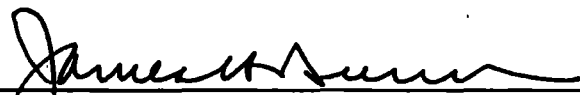
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR: Branch River Country Club

[Name of De Minimis Settling Party]

Date: Jan 12, 1996


James Dunn, Secretary
c/o Attorney Mark A. Miller
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of the
Above-Signed Party:

Attorney Mark A. Miller
Whyte Hirschboeck Dudek S.C.
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Braun Building Center, Inc.

[Name of De Minimis Settling Party]

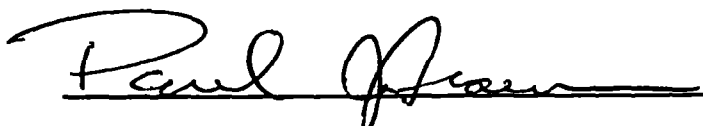
Date: 2-9-96



Paul Braun, Vice President
3303 Menasha Avenue
Manitowoc, WI 54220
(414) 682-0143

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:



Paul Braun, Vice President
3303 Menasha Avenue
Manitowoc, WI 54220 (414) 682-0143
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

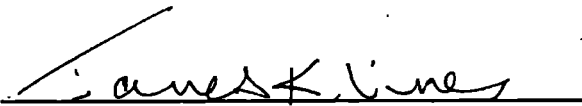
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR BRIDGESTONE/FIRESTONE, INC.

[Name of De Minimis Settling Party]

Date: DECEMBER 14, 1995


JAMES K. VINES
GENERAL COUNSEL - ENVIRONMENTAL
BRIDGESTONE/FIRESTONE, INC.
50 CENTURY BOULEVARD
NASHVILLE, TENNESSEE 37214
(615) 872-1498
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

JANE K. MURPHY, ESQ.
JONES, DAY, REAVIS & POGUE
77 WEST WACKER
CHICAGO, ILLINOIS 60601-1692
(312) 269-4239

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR City of Brillion

[Name of De Minimis Settling Party]

Date: 27 Dec 95

Robert R. Reinke

Robert Reinke, Mayor
City of Brillion
130 Calumet Street
Brillion, WI 54110
414-756-2078

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Judith I. Zeuske

Judith I. Zeuske, City Clerk-Treasurer
130 Calumet Street
Brillion, WI 54110
414-756-2250

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Brillion Iron Works, Inc.

[Name of De Minimis Settling Party]

Date: 12-15-95

J. David McClain
J. David McClain, President
Brillion Iron Works, Inc.
200 Park Avenue
Brillion, Wisconsin 54110
(414) 756-2121

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Steven A. Smith, Esquire
Wilson & McIlvaine
Citicorp Center, Suite 3700
500 West Madison Street, Chicago, Illinois 60661-2511 (312) 715-
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

771 North La Salle
Suite 863
Chicago, IL 60601

GLOBAL DE MINIMIS CONSENT DECREE

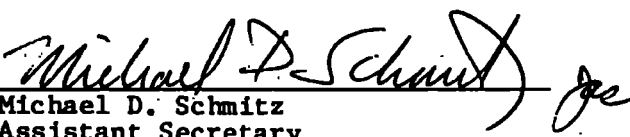
THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR BRUNSWICK CORPORATION

[Name of De Minimis Settling Party]

Date: February 22, 1996

By


Michael D. Schmitz
Assistant Secretary
Brunswick Corporation
1 N. Field Ct.
Lake Forest, IL 60045-4811
(847) 735-4303

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Robert T. McNaney
General Counsel
Brunswick Corporation
1 N. Field Ct.
Lake Forest, IL 60045-4811
(847) 735-4305

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

Contact for Other than Service of Process:

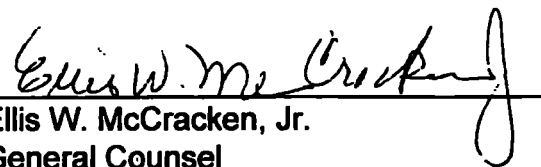
James A. Carney
Environmental Counsel
Brunswick Corporation
1 N. Field Ct.
Lake Forest, IL 60045-4811
Tel. (847) 735-4303

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

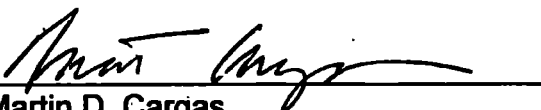
For: Busch Agricultural Resources, Inc.
(Name of De Minimis Settling Party)

Date: Jan. 2, 1996


Ellis W. McCracken, Jr.
General Counsel
Anheuser-Busch Companies, Inc.
One Busch Place, 202-6
St. Louis, MO 63118
(314) 577-2620

Agent Authorized to Accept Service of Process on Behalf of the Above-

Signed Party:


Martin D. Cargas
Associate General Counsel
Anheuser-Busch Companies, Inc.
One Busch Place, 202-6
St. Louis, MO 63118
(314) 577-4592

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR CANLEY Co. Division
of Contemporary, Inc.

[Name of De Minimis Settling Party]

Date: 12/15/95

James P. Peterson
JAMES P. PETERSON
747 MEMORIAL DR
MANITOWOC, WI 54220
414-682-2844 (HOME)

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: James P. Peterson
747 Memorial Dr.
Manitowoc, WI 54220
(414) 682-2844 (HOME)

[Name, Address and Phone Number of
Authorized Agent for Service of Process]


GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Consumers, Inc.

[Name of De Minimis Settling Party]

Date: December 15, 1995



Philip R. Eck
Secretary

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Christopher J. Jaekels

Cooke & Franke S.C.
650 East Mason Street
Milwaukee, WI 53202
414-271-5900

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR CRAFTS ELECTRIC, INC.
1118 SOUTH 10TH STREET
MANITOWOC, WI 54220
[Name of De Minimis Settling Party]

Date: JANUARY 22, 1996

 (V. Pres)

JEFF J. DIEDERICHS
1118 SOUTH 10TH STREET
MANITOWOC, WI 54220
(414)-682-4684
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

JEFF J. DIEDERICHS
1118 SOUTH 10TH STREET
MANITOWOC, WI 54220
(414)-682-4684
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

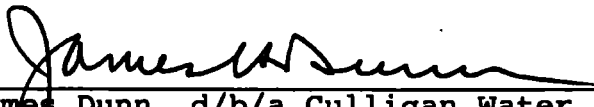
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. Conditioning relating to the Lemberger Landfill Superfund Sites.

FOR: James Dunn, d/b/a Culligan Water Conditioning

[Name of De Minimis Settling Party]

Date: 1-12-96


James Dunn, d/b/a Culligan Water Conditioning
c/o Attorney Mark A. Miller
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of Officer Authorized to Sign on Behalf of De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

Attorney Mark A. Miller
Whyte Hirschboeck Dudek S.C.
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Fechner, Gary and Nancy
D/B/A Dairy Queen, Manitowoc

[Name of De Minimis Settling Party]

Date: 1-19-96

Gary Fechner
Gary Fechner

Date: 1-19-96

Nancy Fechner
Nancy Fechner

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

David J. Pawlowski

Attorney David J. Pawlowski
Post Office Box 187
Manitowoc, WI 54221-0187
(414) 682-4644

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR First National Bank in Manitowoc

[Name of De Minimis Settling Party]

Date: December 13, 1995



Thomas J. Bare, President
402 North 8th Street
Manitowoc, WI 54220
(414) 684-6611

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Same as above.

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

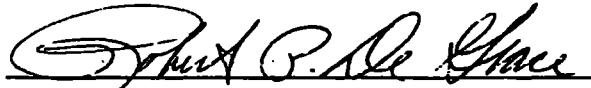
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Fleet and Farm of Manitowoc, Inc.

[Name of De Minimis Settling Party]

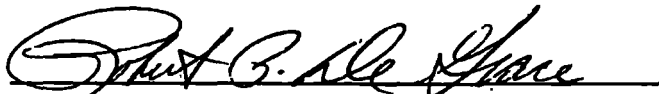
Date: December 20, 1995



Robert P. DeGrace,
Vice President of Operations
1300 S. Lynndale Drive
Appleton, WI 54912-1199
Phone: (414) 731-8121

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:



Robert P. DeGrace, Vice President of Operations
1300 S. Lynndale Drive - Appleton, WI 54912-1199
Phone: (414) 731-8121

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. relating to the Lemberger Landfill Superfund Sites.

FOR Gaterman Manufacturing Company

[Name of De Minimis Settling Party]

Date: JAN 18, 1996

W. C. Gaterman III

William C. Gaterman III - President —
114 Meadowbrook Circle
Daytona Beach, FL 32114

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Mr. Glenn R. Gaterman
Registered Agent
836 S. 15
Manitowoc, WI 54220

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Gould Inc. (f/k/a Imperial Eastman)

[Name of De Minimis Settling Party]

Date: 13 December 1995

Michael C. Veysey
Michael C. Veysey
Senior Vice President, General Counsel & Secretary
Gould Electronics Inc.
35129 Curtis Boulevard
Eastlake, OH 44095
Tel: (216) 953-5170
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:


Michael C. Veysey
Senior Vice President, General Counsel & Secretary
Gould Electronics Inc.
35129 Curtis Boulevard
Eastlake, OH 44095 Tel: (216) 953-5170
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR ~~HAMANN CONSTRUCTION COMPANY~~
4613 W. CUSTER STREET
MANITOWOC, WI 54220
(414) 682-8282
[Name of De Minimis Settling Party]

Date: 12/27/95


STEVE HAMANN
4613 W. CUSTER STREET
P.O. BOX 245
MANITOWOC, WI 54221-0245
(414) 682-8282
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

ATTORNEY RON A. KAMINSKI
KAMINSKI, POZORSKI & GREIG
846 NORTH 8TH STREET
P.O. BOX 609
MANITOWOC, WI 54221-0609
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
(414) 684-6694

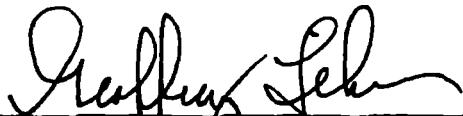
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR Heresite Protective Coatings, Inc.

[Name of De Minimis Settling Party]

Date: Januray 9, 1996


By: Geoffrey Liban, President
Geoffrey Liban
822 S. 14th St.
Manitowoc, WI 54220
(414) 684-6646

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Michael P. Dunn, Esq.
Davis & Kuelthau, S.C.
111 E. Kilbourn, Suite 1400
Milwaukee, WI 53202
(414) 225-1425

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Hoffman Bros., Inc.
1422 River Place
Two Rivers, WI 54241
Phone No.: 414/793-1372
[Name of De Minimis Settling Party]

Date: December 18, 1995

By: Lester J. Lodl
Lester J. Lodl, President

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Oliver T. Skrivanie
Oliver T. Skrivanie
Attorney at Law
1509 - 19th Street
P.O. Box 117
Two Rivers, WI 54241
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
Telephone No. 414/793-4521
FAX No. 414/793-5927

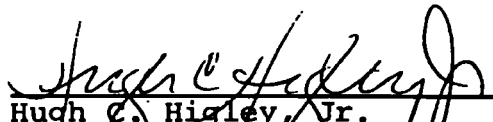
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

Interstate Welding Sales Corp.
FOR for Manitowoc Oxygen

[Name of De Minimis Settling Party]

Date: 12-14-95


Hugh C. Higley, Jr.
Sr. Vice President and CFO
Interstate Welding Sales Corp.
1801 Marinette Ave., P.O. Box 257
Marinette, WI 54143-0257
(715) 732-7950

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Hugh C. Higley, Jr.
Senior Vice President and CFO
Interstate Welding Sales Corp.
(for Manitowoc Oxygen)
1801 Marinette Ave., P.O. Box 257
Marinette, WI 54143-0257
(715) 732-7950

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

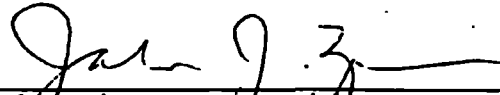
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. relating to the Lemberger Landfill Superfund Sites.

FOR: J. J. Stangel Co.

[Name of De Minimis Settling Party]

Date: 1/10/96



John Zimmer, President
c/o Attorney Mark A. Miller
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of the
Above-Signed Party:

Attorney Mark A. Miller
Whyte Hirschboeck Dudek S.C.
21 Maritime Drive
Manitowoc, WI 54220
(414) 683-3500

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al. relating to the
Lemberger Landfill Superfund Sites.

FOR JAGEMANN STAMPING COMPANY

Date: 19-DEC-95

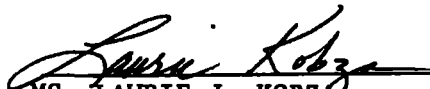
[Name of De Minimis Settling Party]



ROBERT W. JAGEMANN
JAGEMANN STAMPING COMPANY
P.O. BOX 217, 2814 WOLLMER ST.
MANITOWOC, WI 54221-0217
(414) 682-4633

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:



MS. LAURIE J. KOBZA PH: (608) 283-1788
BOARDMAN, SUHR, CURRY & FIELD
FIRSTAR PLAZA, SUITE 410
1 SOUTH PINKNEY STREET, P.O. BOX 927 MADISON, WI 53701-0927
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR KAUFMAN MFG. CO.

[Name of De Minimis Settling Party]

Date: 12-14-95

RE KAUFMAN
RE KAUFMAN, PRESIDENT
PO BOX 1056
MANITOWOC, WI 54221-1056
(414) 684-6641
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

RE KAUFMAN
KAUFMAN MFG. CO.
PO BOX 1056 MANITOWOC, WI 54221-1056
(414) 684-6641
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Village of Kellnersville

[Name of De Minimis Settling Party]

Date: 1-2-1996

Donald A. Fogeltanz

Donald Fogeltanz, Village President
Village of Kellnersville
PO Box 117
Kellnersville, WI 54215
414-732-3397

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Elizabeth L. Duggan, Clerk

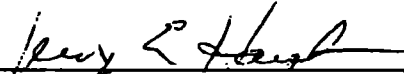
Elizabeth L. Duggan, Village Clerk
Village of Kellnersville
PO Box 87
Kellnersville, WI 54215
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
414-686-1052

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. relating to the Lemberger Landfill Superfund Sites.

FOR: LAKELAND LANDSCAPE SERVICE, INC.

Dated: December 15, 1995



Jerry E. Haupt, President
4141 Viebahn Street
Manitowoc, WI 54220
Phone: 414-682-5707
(Officer Authorized to sign on
Behalf of De Minimis Settling Party)

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

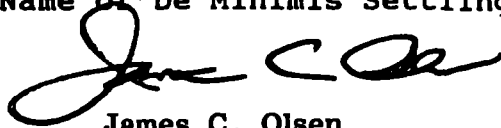
Jerry E. Haupt
4141 Viebahn Street
Manitowoc, WI 54220
Phone: 414-682-5707
Fax: 414-682-9471

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Lakeside Machine Shop, Inc.

[Name of De Minimis Settling Party]



Date: December 18, 1995

James C. Olsen
Secretary-Treasurer
Lakeside Machine Shop, Inc.
P. O. Box 15186
Minneapolis, MN 55415-0186

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Phone: (612) 344-1969
FAX: (612) 332-6841

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Vernon R. Poertner, R.A.
1128 N. 6th Street
Manitowoc, WI 54220
(414) 684-5076

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

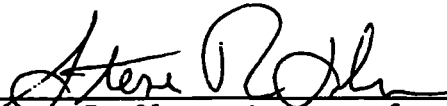
THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the

Lemberger Landfill Superfund Sites. The allocation and amount referred to in the Global De Minimis Consent Decree has been modified to \$600 to the United States and \$2,833 to the LSRG pursuant to agreement of the parties. Said sum includes all liability of Late's Bar-B-Q Stand to the United States and LSRG as addressed by this decree.

FOR LATE'S BAR-B-Q STAND


[Name of De Minimis Settling Party]

Date: February 26, 1996


Steven R. Olson, Attorney for Late's Bar-B-Q Stand
Radosevich, Mozinski & Cashman
P.O. Box 1868
Manitowoc, WI 54221-1868
(414) 684-1234

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:


Steven R. Olson, Attorney for Late's Bar-B-Q Stand
Radosevich, Mozinski & Cashman, P.O. Box 1868,
Manitowoc, WI 54221-1868
(414) 684-1234

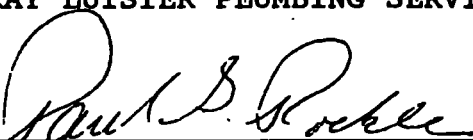
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. relating to the Lemberger Landfill Superfund Sites.

FOR: RAY LUISIER PLUMBING SERVICE, INC.

Dated: December 14, 1995


Paul G. Roekle, President
2510 Marshall Street
Manitowoc, WI 54220
Phone: 414-682-3666
(Officer Authorized to sign on
Behalf of De Minimis Settling Party)

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

Paul G. Roekle
2510 Marshall Street
Manitowoc, WI 54220
Phone: 414-682-3666
Fax: 414-682-3754

GLOBAL DE MINIMIS CONSENT DECREE


THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al. relating to the Lemberger Landfill Superfund Sites.

FOR COUNTY OF MANITOWOC

[Name of De Minimis Settling Party]

Under Wisconsin Law, Manitowoc County is not bound by this agreement until a Resolution authorizing it has been adopted in open session by the Manitowoc County Board of Supervisors. Such a resolution will be put on the agenda of the next Regular meeting of said body, scheduled for January 16, 1996. Counsel for the EPA and Lemberger Sites Remediation Group will be provided with a Certified Copy of said Resolution by mail within 5 working days after its adoption.

Date: December 22, 1995.


Robert J. Zeman
Manitowoc County Corporation Counsel
State Bar No. 01015016
Manitowoc County Corporation Counsel
1010 S. 8th St.
Manitowoc, WI 54220
(414) 683-4062

[Name, Address and Phone Number of
officer Authorized to Sign on Behalf of
De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Robert J. Zeman
Manitowoc County Corporation Counsel
Plaintiff's Attorney
1010 S. 8th St.
Manitowoc, WI 54220
(414) 683-4062

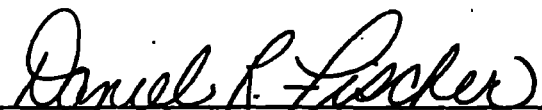
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

STATE OF WISCONSIN)

COUNTY OF MANITOWOC)

I, Daniel R. Fischer, County Clerk of Manitowoc County, do hereby certify that the attached resolution is a true and correct copy of the original resolution required by law to be in my custody and which was adopted by the County Board of Supervisors of Manitowoc County at a meeting held on January 16, 1996.

Set my hand and official seal this 17th day of January, 1996.


Daniel R. Fischer, County Clerk

57a

RESOLUTION APPROVING THE EXECUTION OF A "GLOBAL CONSENT DECREE"
WITH THE UNITED STATES OF AMERICA AND THE LEMBERGER SITES
REMEDATION GROUP AND AUTHORIZING EXPENDITURES TOTALING \$127,614.00
TO SETTLE CLAIMS AGAINST THIS COUNTY ARISING OUT OF THE OPERATIONS
OF THE LEMBERGER LANDFILLS

TO THE CHAIRPERSON AND BOARD OF SUPERVISORS
OF MANITOWOC COUNTY, WISCONSIN

Supervisors:

WHEREAS, Manitowoc County has been named as a defendant in a lawsuit currently pending in the United States District Court for the Eastern District of Wisconsin entitled: *Lemberger Sites Remediation Group v. A.M. Richter & Sons, Co., et al* Case No. 95-C-1065;

AND WHEREAS, the United States of America, acting through the Environmental Protection Agency has claims against this county which could be asserted in another presently pending suit in said court;

AND WHEREAS, the aforesaid matters relate to response costs under the "Comprehensive Environmental Response, Compensation and Liability Act of 1980," incurred in connection with landfills in the Town of Franklin in which the solid wastes generated by a number of county departments were disposed of during the period of time the said landfills were in operation;

AND WHEREAS, disputes exist as to the nature and extent of the county's liability, if any, for such response costs;

AND WHEREAS, Manitowoc County wishes to settle these disputed claims and obtain the protections being offered by the Lemberger Sites Remediation Group and the United States from claims asserted by other Potentially Responsible Parties in connection with said landfills by paying a settlement and premium acceptable to the Lemberger Sites Remediation Group and the United States and to buy its peace;

NOW, THEREFORE, BE IT RESOLVED that the Corporation Counsel be, and is hereby, authorized to enter into a "Global Consent Decree" on behalf of this county, which, after publication in the Federal Register and approval by the court will require the following payments by this county for such settlement with premium:

To the Lemberger Sites Remediation Group:	\$96,760.00
To the United States:	\$30,854.00
TOTAL:	<u>\$127,614.00</u>

1 BE IT FURTHER RESOLVED, that the foregoing payments be
2 made from the WMMIC Self-Insured Reserve Fund within forty-five
3 days of the entry of the "Global Consent Decree" by the court;

4 BE IT FURTHER RESOLVED, that should the aforesaid
5 decree not be entered by the court, for any reason, this
6 Resolution shall be void and of no effect.
7

Dated this 16th day of January, 1996.

Respectfully submitted,

Don C. Markwardt
Don C. Markwardt, Chairperson

Fiscal Impact: Requires payments totaling \$127,614.00 from the
WMMIC Self-insured Reserve Fund.

Adopted this 16th day of January, 1996.

23 Ayes 0 Noes 2 Absent

ATTEST:

Daniel R. Fischer
Daniel R. Fischer, County Clerk

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Manitowoc Grey Iron Foundry

[Name of De Minimis Settling Party]

Date: 12-14-95



Robert Peaslee
Vice President - Manitowoc Grey Iron Foundry
2701 Division Street - P.O. Box 548
Manitowoc, WI 54221-0548
(414) 684-0311

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Arthur A. Vogel, Jr.
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, WI 53202-4497
(414) 277-5000

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR MANITOWOC LANDSCAPE, INC.

[Name of De Minimis Settling Party]

Date: 3/14/96

(TIM POKLINKOSKI)

TIM POKLINKOSKI (VICE PRES.)
4912 CR, MANITOWOC, WI, 54220-9298
414 758-2231

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc. et al., relating to the Lemberger Landfill Superfund Sites.

FOR MANITOWOC PUBLIC SCHOOL DISTRICT

[Name of De Minimis Settling Party]

Date: 12/27/95



JOHN CRUBAUGH, SUPERINTENDANT
MANITOWOC PUBLIC SCHOOL DISTRICT
1010 HURON STREET
P.O. BOX 1657
MANITOWOC, WI 54221-1657
(414) 683-4777
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

ATTORNEY RON A. KAMINSKI
KAMINSKI, POZORSKI & GREIG
846 NORTH 8TH STREET
P.O. BOX 609
MANITOWOC, WI 54221-0609
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
(414) 684-6694

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR

Manitowoc Self Service Car Wash
Manitowoc Self Service Car Wash

[Name of De Minimis Settling Party]

Date:

12/18/95

Robert D. Thornley
Robert D. Thornley
1768 Main Street
Green Bay, WI 54302

1-414-468-7529

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

James R. Hoy

James R. Hoy
Quarles & Brady
411 E. Wisconsin Avenue, Milwaukee, WI 53202
(414) 277-5543

[Name, Address and Phone Number of
Authorized Agent for Service of Process]


GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR MCMULLEN & PITZ CONSTRUCTION CO.

[Name of De Minimis Settling Party]

Date: January 15, 1996


WILLOTT PITZ
MCMULLEN & PITZ *Construction Co.*
17 MARITIME DRIVE
P.O. BOX 8
MANITOWOC, WI 54221-0008
(414) 682-0131
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

ATTORNEY RON A. KAMINSKI
KAMINSKI, POZORSKI & GREIG
846 NORTH 8TH STREET
P.O. BOX 609
MANITOWOC, WI 54221-0609
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
(414) 684-6694

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al. relating to the
Lemberger Landfill Superfund Sites.

MEADOW LINKS A.K.A.
FOR MEADOW LANES, INC.

[Name of De Minimis Settling Party]

Date: 3-18-96

Ralph A. Skarda

RALPH A. SKARDA, Pres.
1202 HURON ST, MANITOWOC, WI. 54220
phone 414-684-3431

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Ralph A. Skarda

RALPH A. SKARDA
1202 HURON ST, MANITOWOC, WI. 54220
phone 414-684-3431

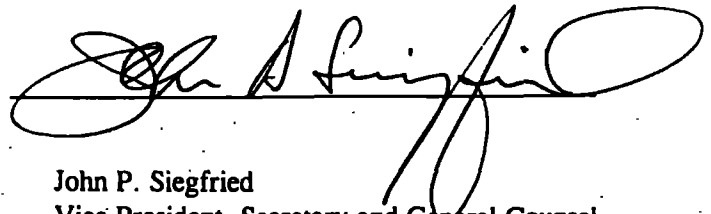
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Medusa Corporation

Date: December 14, 1995



John P. Siegfried
Vice President, Secretary and General Counsel
Medusa Corporation
3008 Monticello Boulevard
Cleveland Hts., OH 44118

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

John P. Siegfried
Vice President, Secretary and General Counsel
Medusa Corporation
3008 Monticello Boulevard
Cleveland Hts., OH 44118

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR MIKE CHECK BUILDERS, INC.

[Name of De Minimis Settling Party]

Date: December 14, 1995.

Michael E. Check

Michael E. Check
6945A Tall Oaks Road
Manitowoc, WI 54220
(414) 682-7352

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

John M. Webster

John M. Webster
814 South 8th Street, P.O. Box 487
Manitowoc, WI 54221-0487
(414) 682-8181

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

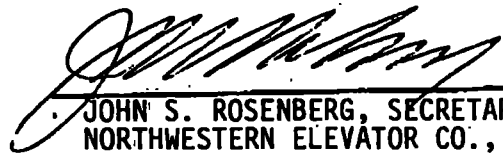
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR NORTHWESTERN ELEVATOR CO., INC.

[Name of De Minimis Settling Party]

Date: FEBRUARY 28, 1996


JOHN S. ROSENBERG, SECRETARY/TREASURER
NORTHWESTERN ELEVATOR CO., INC.
6070 N. FLINT ROAD
MILWAUKEE WI 53209-0976
414-228-1424

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

JOHN S. ROSENBERG, SECRETARY/TREASURER
NORTHWESTERN ELEVATOR CO., INC.
6070 N. FLINT ROAD
MILWAUKEE WI 53209-0976 414-228-1424
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

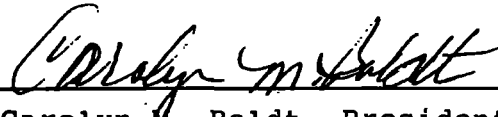
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc. et al. relating to the Lemberger Landfill Superfund Sites.

FOR Oil-Rite Corporation

[Name of De Minimis Settling Party]

Date: December 28, 1995



Carolyn M. Boldt, President
Oil-Rite Corporation
4325 Clipper Drive
P.O. Box 1207
Manitowoc, WI 54221-1207

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Carolyn M. Boldt, President
Oil-Rite Corporation
4325 Clipper Drive
P.O. Box 1207
Manitowoc, WI 54221-1207
(414) 682-6173

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR Rehr Bio-Technical Laboratories

[Name of De Minimis Settling Party]

Michael Sfat, President

Date: 12-12-95

Michael L. Sfat
1035 S. 7th St.
Manitowoc, WI 54220
414.684.5518

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Michael R. Sfat

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Reedsville Cooperative

[Name of De Minimis Settling Party]

Date: 1/2/95

Robert Lowe

Robert Lowe, General Manager
Reedsville Cooperative Ass'n.
709 Mill Street
Reedsville, WI 54230

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Jerome L. Fox

Olson, Winter & Fox
1607 Washington Street
P.O. Box 156 Two Rivers, WI 54241-0156 (414) 793-1364
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

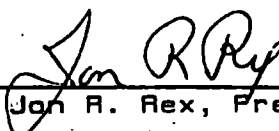
GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR REX - CLEAN, INC.

[Name of De Minimis Settling Party]

Date: DECEMBER, 13, 1995


Jon R. Rex, President

Jon R. Rex
P. O. Box 1748
Manitowoc, WI 54221-1748
414-682-6312

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

JON R. REX

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill Superfund Sites.

FOR Santa's Best (FKA National Tissue Mfg. Co.)

[Name of De Minimis Settling Party]

John P. Protz, Vice President

Date: 12/13/95

John P. Protz

1133 South 16th St
Manitowoc, WI 54220 -
414-684-4448

[Name, Address and Phone Number of Officer Authorized to Sign on Behalf of De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

Donald A. Glassser &
Heavenfield Eisenberg Janger
& Glassser
33 W. Monroe St

Suite 2100

Chicago, Ill. 60603
312-346-8380

[Name, Address and Phone Number of Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR William Schaus & Son, Inc.
n/k/a Schaus Roofing &
Mechanical Contractors, Inc.

[Name of De Minimis Settling Party]

Date: 12-14-95

Thomas A. Schaus

Thomas A. Schaus
Schaus Roofing & Mechanical Contractors,
Inc.

2901 Calumet Avenue
Manitowoc, WI 54220 (414) 684-5559

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Thomas A. Schaus

Schaus Roofing & Mechanical Contractors, Inc.
2901 Calumet Avenue
Manitowoc, WI 54220
(414) 684-5559

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

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matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR SCHWERMAN TRUCKING CO.

[Name of De Minimis Settling Party]

Date: December 15, 1995

by *Stephen M. Budman*, *VICE PRESIDENT*
c/o Schwerman Trucking Co.
611 South 28th Street
P.O. Box 1601
Milwaukee, WI 53201-1601
Phone 414/671-8040

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: James R. Ziperski - General Counsel
Schwerman Trucking Co.
611 South 28th Street
P.O. Box 1601
Milwaukee, WI 53201-1601

Phone 414/671-8075

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

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FOR Shell Oil Company

[Name of De Minimis Settling Party]

Date: 12-13-95

Kent W. Rogers

Kent W. Rogers
Manager Remediation
Shell Oil Company
P.O. Box 4320
Houston, TX 77210-4320
(713) 241-6429

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

William C. Lowrey

William C. Lowrey
Shell Oil Company
P.O. Box 2463

Houston, TX 77252 Tel: (713) 241-1678

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

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matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Shoto Corporation, f/k/a Shoto
Fixture & Supply
6450 CTH B
Two Rivers, WI 54241
Phone: 414/682-0196
[Name of De Minimis Settling Party]

Date: December 18, 1995

By Eugene F. Holly
Eugene F. Holly, President

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Oliver T. Skrivanie
Oliver T. Skrivanie
Attorney at Law
1509 - 19th Street
P.O. Box 117, Two Rivers, WI 54241
[Name, Address and Phone Number of
Authorized Agent for Service of Process]
Telephone No. 414/793-4521
FAX No. 414/793-5927

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Lemberger Landfill Superfund Sites.

FOR SILVER CREEK NURSERIES LLC

[Name of De Minimis Settling Party]

Date: FEB 7, 1996

Kevin Edgar - Treasurer
KEVIN EDGAR
1445 N. 23RD ST
MANTON, WI 54220
414-684-1225

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Kevin Edgar
SAME AS ABOVE

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

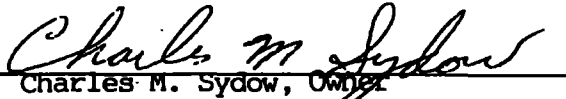
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FOR Superior Watercare, Inc.

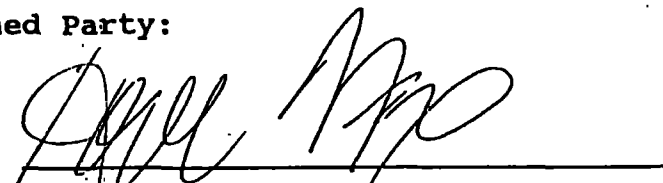
[Name of De Minimis Settling Party]

Date: 12/18/95


Charles M. Sydow, Owner
5713 County Trunk R
Manitowoc, WI 54220

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:


Jerome L. Fox, Attorney at Law
1607 Washington Street
Two Rivers, WI 54241-0156

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

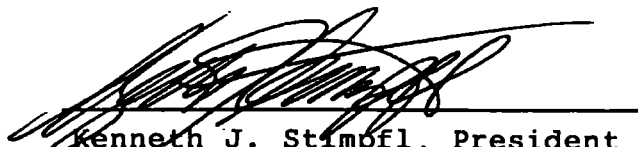
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Lemberger Landfill Superfund Sites.

FOR Swanson Environmental, Inc.

[Name of De Minimis Settling Party]

Date: December 13, 1995


Kenneth J. Stimpfl, President
Swanson Environmental, Inc.
24156 Haggerty Road
Farmington Hills, MI 48335
(810) 478-2700

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: Kenneth J. Stimpfl, President
Swanson Environmental, Inc.
24156 Haggerty Road
Farmington Hills, MI 48335
(810) 478-2700

~~None~~

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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Lemberger Landfill Superfund Sites.

FOR Terp's Calumet Auto Sales

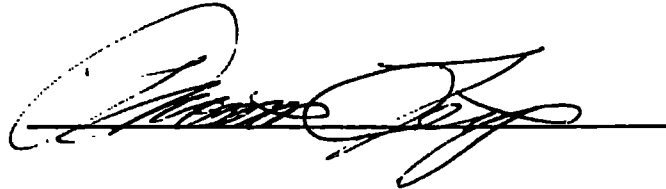
[Name of De Minimis Settling Party]

Date: 1/22/96

Thomas Terp
826 22nd Street
Two Rivers, WI 54241
414-794-1230

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:



[Name, Address and Phone Number of
Authorized Agent for Service of Process]

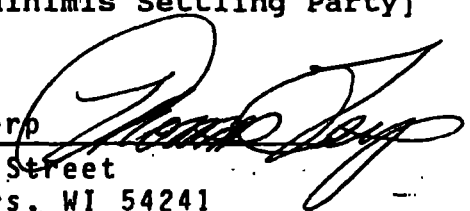
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FOR Terp's Calumet Auto Sales

[Name of De Minimis Settling Party]

Date: 1/22/96



Thomas Terp
826 22nd Street
Two Rivers, WI 54241
414-794-1230

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
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Agent Authorized to Accept Service of Process on Behalf of
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[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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FOR VILLAGE OF VALDERS

[Name of De Minimis Settling Party]

Date: December 28, 1995

Nancy Roerdink

Nancy Roerdink
Village Clerk
Village of Valders
207 South Liberty Street
Valders, WI 54245
(414) 775-4522

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Nancy Roerdink

Nancy Roerdink

Village of Valders Clerk
207 South Liberty Street
Valders, WI 54245
(414) 775-4522

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

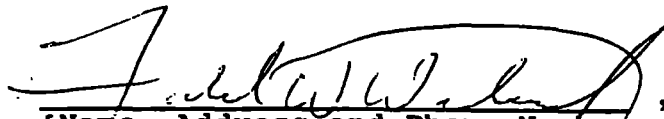
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matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Walsdorf Roofing Company, Inc.

[Name of De Minimis Settling Party]

Date: January 24, 1996

 , President
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party] Todd W. Walsdorf/Walsdorf Roofing Co., Inc
P.O. Box 66
Kiel, WI 53042-0066 414/894-2286

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: Todd W. Walsdorf, President
P.O. Box 66
Kiel, WI 53042-0066
(414) 894-2286

Name, Address and Phone Number of
Authorized Agent for Service of Process

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR WHITELAW SAUSAGE CO.

[Name of De Minimis Settling Party]

Date: DEC. 15, 1995

Alvin Stueber
ALVIN STUEBER, PRESIDENT
239 MAPLE ST.
WHITELAW, WIS. 54247
414-732-3193

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

WHITELAW SAUSAGE CO.
ALVIN STUEBER, PRESIDENT
239 MAPLE ST., BOX 175
WHITELAW, WIS. 54247

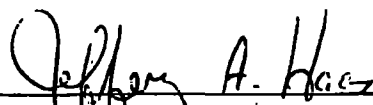
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill
Superfund Sites.

For: Wisconsin Bell Telephone Co.
d/b/a Ameritech-Wisconsin

Date: February 13, 1996


Jeffrey A. Haas
EHS Manager
Ameritech
2356 South 111th Street
West Allis, Wisconsin 53227

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed

Party: Samuel W. Ach
Counsel
Ameritech
225 W. Randolph - HQ27C
Chicago, Illinois 60606
(312)727-4121

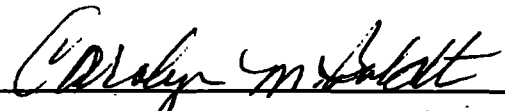
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FOR Oil-Rite Corporation

[Name of De Minimis Settling Party]

Date: December 28, 1995



Carolyn M. Boldt, President
Oil-Rite Corporation
4325 Clipper Drive
P.O. Box 1207
Manitowoc, WI 54221-1207

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Carolyn M. Boldt, President
Oil-Rite Corporation
4325 Clipper Drive
P.O. Box 1207
Manitowoc, WI 54221-1207
(414) 682-6173

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
A.C.E. Building Service, Inc., et al.
matter of United States v. _____, relating to the
Lemberger Landfill Superfund Sites.

FOR Rohr Bio-Technical Laboratories

[Name of De Minimis Settling Party]

Michael Sfat, President

Date: 12-12-95

Michael L. Sfat
1035 S. 7th St.
Manitowoc, WI 54220
414 6845518

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Michael R. Sfat

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Reedsville Cooperative

[Name of De Minimis Settling Party]

Date: 1/2/95

Robert Lowe

Robert Lowe, General Manager
Reedsville Cooperative Ass'n.
709 Mill Street
Reedsville, WI 54230

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Jerome L. Fox

Olson, Winter & Fox
1607 Washington Street
P.O. Box 156 Two Rivers, WI 54241-0156 (414) 793-1364
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR REX - CLEAN, INC.

[Name of De Minimis Settling Party]

Date: DECEMBER, 13, 1995


Jon R. Rex, President

Jon R. Rex
P. O. Box 1748
Manitowoc, Wi 54221-1748
414-682-6312

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

JON R. REX

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

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matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR Santa's Best (FKA National Tinsel
Mfg. Co.

[Name of De Minimis Settling Party]

John P. Protz, Vice President

Date: 12/13/95

John Protz

1133 South 16th St
Manitowoc, WI 54220 -
414-684-4448

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Donald A Glassberg
Levenfeld Eisenberg Janger
& Glassberg
33 W Monroe ST

Suite 2100
Chicago, Ill. 60603
312-346-8380

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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FOR William Schaus & Son, Inc.
n/k/a Schaus Roofing &
Mechanical Contractors, Inc.

[Name of De Minimis Settling Party]

Date: 12-14-95

Thomas A. Schaus
Thomas A. Schaus
Schaus Roofing & Mechanical Contractors,
Inc.
2901 Calumet Avenue
Manitowoc, WI 54220 (414) 684-5559

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Thomas A. Schaus
Schaus Roofing & Mechanical Contractors, Inc.
2901 Calumet Avenue
Manitowoc, WI 54220
(414) 684-5559
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR SCHWERMANN TRUCKING CO.

[Name of De Minimis Settling Party]

Date: December 15, 1995

by *Stephen M. Budman*, VICE PRESIDENT
c/o Schwermann Trucking Co.
611 South 28th Street
P.O. Box 1601
Milwaukee, WI 53201-1601
Phone 414/671-8040

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

James R. Ziperski - General Counsel
Schwermann Trucking Co.
611 South 28th Street
P.O. Box 1601
Milwaukee, WI 53201-1601
Phone 414/671-8075

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FOR Shell Oil Company

[Name of De Minimis Settling Party]

Date: 12-13-95

Kent W. Rogers

Kent W. Rogers
Manager Remediation
Shell Oil Company
P.O. Box 4320
Houston, TX 77210-4320
(713) 241-6429

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

William C. Lowrey

William C. Lowrey
Shell Oil Company
P.O. Box 2463
Houston, TX 77252 Tel: (713) 241-1678
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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FOR Shoto Corporation, f/k/a Shoto
Fixture & Supply
6450 CTH B
Two Rivers, WI 54241
Phone: 414/682-0196
[Name of De Minimis Settling Party]

Date: December 18, 1995

By: Eugene F. Holly
Eugene F. Holly, President

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Oliver T. Skrivanie
Oliver T. Skrivanie
Attorney at Law
1509 - 19th Street
P.O. Box 117, Two Rivers, WI 54241
[Name, Address and Phone Number of
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Telephone No. 414/793-4521
FAX No. 414/793-5927

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Lemberger Landfill Superfund Sites.

FOR SILVER CREEK NURSERIES LLC

[Name of De Minimis Settling Party]

Date: FEB 7, 1996

Kevin Edgar - Treasurer
KEVIN EDGAR
1445 N. 23RD ST
MANITOWOC, WI 54220
414-684-1225

[Name, Address and Phone Number of
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Party]

Agent Authorized to Accept Service of Process on Behalf of
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Kevin Edgar
SAME AS ABOVE

[Name, Address and Phone Number of
Authorized Agent for Service of Process]


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FOR Superior Watercare, Inc.

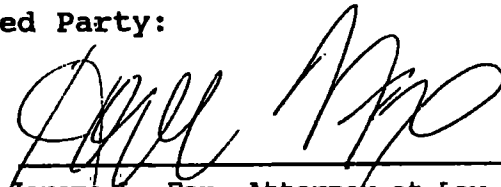
[Name of De Minimis Settling Party]

Date: 12/18/95


Charles M. Sydor, Owner
5713 County Trunk R
Manitowoc, WI 54220

[Name, Address and Phone Number of
Officer Authorized to Sign on
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Agent Authorized to Accept Service of Process on Behalf of
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Jerome L. Fox, Attorney at Law
1607 Washington Street
Two Rivers, WI 54241-0156

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

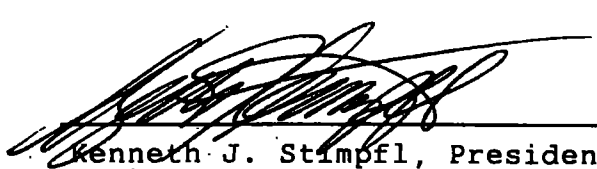
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FOR Swanson Environmental, Inc.

[Name of De Minimis Settling Party]

Date: December 13, 1995


Kenneth J. Stimpfl, President
Swanson Environmental, Inc.
24156 Haggerty Road
Farmington Hills, MI 48335
(810) 478-2700

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: Kenneth J. Stimpfl, President
Swanson Environmental, Inc.
24156 Haggerty Road
Farmington Hills, MI 48335
(810) 478-2700
~~None-~~

[Name, Address and Phone Number of
Authorized Agent for Service of Process]

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FOR Terp's Calumet Auto Sales

[Name of De Minimis Settling Party]

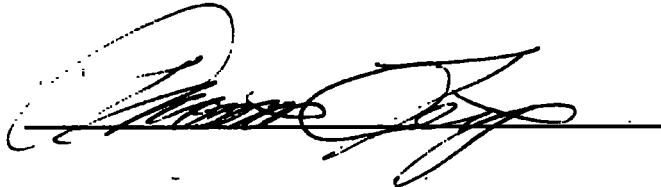
Date: 1/22/96

Thomas Terp

826 22nd Street
Two Rivers, WI 54241
414-794-1230

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:



[Name, Address and Phone Number of
Authorized Agent for Service of Process]

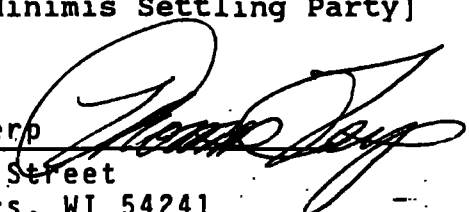
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FOR Terp's Calumet Auto Sales

[Name of De Minimis Settling Party]

Date: 1/22/96


Thomas Terp
826 22nd Street
Two Rivers, WI 54241
414-794-1230

[Name, Address and Phone Number of Officer Authorized to Sign on Behalf of De Minimis Settling Party]

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed Party:

[Name, Address and Phone Number of Authorized Agent for Service of Process]

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FOR VILLAGE OF VALDERS

[Name of De Minimis Settling Party]

Date: December 28, 1995

Nancy Roerdink

Nancy Roerdink
Village Clerk
Village of Valders
207 South Liberty Street
Valders, WI 54245
(414) 775-4522

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

Nancy Roerdink

Nancy Roerdink

Village of Valders Clerk
207 South Liberty Street
Valders, WI 54245
(414) 775-4522
[Name, Address and Phone Number of
Authorized Agent for Service of Process]


GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. _____, A.C.E. Building Service, Inc., et al.
relating to the
Lemberger Landfill Superfund Sites.

FOR Walsdorf Roofing Company, Inc.

[Name of De Minimis Settling Party]

Date: January 24, 1996

 , President
[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party] Todd W. Walsdorf/Walsdorf Roofing Co., Inc.
P.O. Box 66

Kiel, WI 53042-0066 414/894-2286

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party: Todd W. Walsdorf, President
P.O. Box 66
Kiel, WI 53042-0066
(414) 894-2286

Name, Address and Phone Number of
Authorized Agent for Service of Process


GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR WHITELAW SAUSAGE CO.

[Name of De Minimis Settling Party]

Date: DEC. 15, 1995


ALVIN STUEBER, PRESIDENT
239 MAPLE ST.
WHITELAW, WIS. 54247
414-732-3193

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

WHITELAW SAUSAGE CO.
ALVIN STUEBER, PRESIDENT
239 MAPLE ST., BOX 175

WHITELAW, WIS. 54247

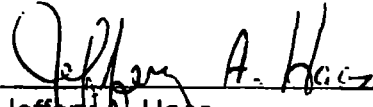
[Name, Address and Phone Number of
Authorized Agent for Service of Process]

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the matter of
United States v. A.C.E. Building Service, Inc., et al., relating to the Lemberger Landfill
Superfund Sites.

For: Wisconsin Bell Telephone Co.
d/b/a Ameritech-Wisconsin

Date: February 13, 1996


Jeffrey A. Haas
EHS Manager
Ameritech
2356 South 111th Street
West Allis, Wisconsin 53227

Agent Authorized to Accept Service of Process on Behalf of the Above-Signed

Party: Samuel W. Ach
Counsel
Ameritech
225 W. Randolph - HQ27C
Chicago, Illinois 60608
(312)727-4121

GLOBAL DE MINIMIS CONSENT DECREE

THE UNDERSIGNED PARTY enters into this Consent Decree in the
matter of United States v. A.C.E. Building Service, Inc., et al., relating to the
Lemberger Landfill Superfund Sites.

FOR WISCONSIN FUEL AND LIGHT COMPANY

[Name of De Minimis Settling Party]

Date: December 14, 1995

Hugh H. Bell
Hugh H. Bell, Secretary
c/o Bell, Metzner, Gierhart & Moore, S.C.
P. O. Box 1807
Madison, WI 53701-1807
(608) 257-3764

[Name, Address and Phone Number of
Officer Authorized to Sign on
Behalf of De Minimis Settling
Party]

Agent Authorized to Accept Service of Process on Behalf of
the Above-Signed Party:

John M. Moore

Bell, Metzner, Gierhart & Moore, S.C.
44 East Mifflin Street, Suite 1000
P. O. Box 1807
Madison, WI 53701-1807 Phone: (608) 257-3764

[Name, Address and Phone Number of
Authorized Agent for Service of Process]